

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

KYMBERLY HOBBS,
ADMINISTRATOR OF THE ESTATE
OF CHARLES JAMES GIVENS,
DECEASED,

Plaintiff,

Case No. 1:23cv00003

V.

ANTHONY RAYMOND KELLY, et al.,

Defendants.

DEFENDANTS ANTHONY KELLY, GREGORY PLUMMER, JOSHUA JACKSON AND WILLIAM MONTGOMERY’S MOTION TO SEAL

Defendants Joshua Jackson, Anthony Kelly, Gregory Plummer and William Montgomery move the Court to seal certain exhibits identified in Defendants' Amended Witness and Exhibit List (ECF. 197), which are listed below. Defendants move that the following exhibits, which were previously marked confidential pursuant to the Protective Order in the case, be filed under seal. Such filing will not restrict the use of the exhibits at trial.

Defendants’ Exhibit No.	Description
9a-q	February 5 surveillance videos and clips from Marion Correctional Treatment Center
10a-ff	Photographs taken inside Marion Correctional Treatment Center
11	Marion Correction Treatment Center’s diagram of 2B hallway
13	Grand Jury Testimony of Ronald West

ANTHONY RAYMOND KELLY
GREGORY SCOTT PLUMMER
JOSHUA RAY JACKSON
WILLIAM ZACHARY
MONTGOMERY

By Counsel

Cameron S. Bell
VSB No. 47685
PENN, STUART & ESKRIDGE
P.O. Box 2288
Abingdon, Virginia 24212
Telephone: 276/628-5151
Facsimile: 276/628-5621
cbell@pennstuart.com

Timothy W. McAfee
Virginia State Bar Number: 21779
McAfee Law Firm, PLLC
P.O. Box 610
408 Wood Avenue
Big Stone Gap, VA 24219
Telephone: (276) 523-5300
Fax: (540) 301-5777
E-mail: tim@mcafee-law.com

By /s/ Cameron S. Bell
Cameron S. Bell
Counsel for Defendants Kelly, Plummer, Jackson and Montgomery

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/Cameron S. Bell